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January 20, 2022

VIA ECF/EMAIL

Honorable Andrew L. Carter, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

RE: UNITED STATES OF AMERICA V. TERRENCE CHALK Case No. 1:21-cr-00049-ALC

Your Honor:

This office represents the Defendant, Terrence Chalk, in the above matter. After conferring with A.U.S.A. Daniel Loss, I understand the Government anticipates receipt of a substantial volume of search warrant returns from Dialpad, which will be produced in discovery. Additionally, to the extent that the Government receives any documents from the SEC pursuant to that agency's memorandum of understanding with the Financial Conduct Authority in the United Kingdom, said documents will also be provided to the defense. Those documents may include materials from a client relationship management portal used by the Defendant. Further, our office is reviewing additional discovery provided by the Government on a terabyte drive, containing a substantial volume of information. The parties request that we provide the Court with a joint status update in sixty (60) days from Monday's date, whereby the Government requests excludable time be entered through that date with the Defendant's consent. We ask this be provided in order for the review of additional discovery to be conducted.

Thank you for your attention to this letter.

Respectfully submitted,

/s/ Max Novel

MAXIMILLIAN A. NOVEL

MAN

cc: Daniel Loss, A.U.S.A., *via ecf and electronic mail*

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♦ Retired Superior Court Judge